



August 19, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WC 16-245; IB 13-213; WC 16-143; WC 15-247; WC 05-25; WC RM-10593; WC 04-186; ET Docket 15-105; ET 13-49; GN 14-177; and WC-13-184

Dear Ms. Dortch:

The Schools, Health & Libraries Broadband (SHLB) Coalition recently released “Connecting Anchor Institutions: A Broadband Action Plan,” which serves as a roadmap for federal, state, and local governments to improve the broadband connectivity for schools, libraries, healthcare providers, and other community anchor institutions (CAIs). The SHLB Coalition encourages the Federal Communications Commission (FCC) to incorporate these recommendations in its future decisions and its digital inclusion plan.

CAIs serve as the gateway to their communities. Providing open, affordable, high-capacity broadband to CAIs ensures that the benefits of Internet access are available to everyone. Schools, libraries, and other CAIs make Internet services available to those most in need – low-income populations, the elderly, minorities, students, the homeless – promoting digital equity and opportunity for all.

This Broadband Action Plan includes a paper called “A Vision of Our Future” that describes the benefits of CAI broadband for education, community connections, remote healthcare, economic growth, civic engagement, and digital equity. The Action Plan then includes ten policy papers with recommendations for how to achieve that vision. Three common themes emerge in the recommendations: 1) **Sharing**, aggregation, partnerships, and collaboration to develop coordinated broadband strategies and reduce costs; 2) **Competition** to provide CAIs with the opportunity to choose the technologies that best meet their needs, such as lit fiber, dark fiber, Wi-Fi, cellular, cable, etc.; and 3) **Funding** to CAIs, network providers, or non-profit organizations to offset the initial costs of broadband deployment.

These themes align with the FCC’s targets for connecting schools and libraries set forth in the December 2014 E-rate order. The FCC has already taken great strides in achieving these goals by adding an additional \$1.5 billion in E-rate funding, equalizing the treatment of lit and dark fiber, reforming Lifeline, and addressing the lack of competition in rural areas. However, there is more to be done.

The SHLB Coalition calls on the FCC to pursue specific policy recommendations laid out in the Broadband Action Plan, such as instituting price controls on special access services where there is market power, enforcing the “lowest corresponding price” rule in the E-rate program, and incentivizing consortium bidding for health services, to name a few. I am attaching a complete list of policy recommendations.

SHLB believes America is moving in the right direction in providing universal broadband access and the FCC has been a main propeller of this progress. However, we cannot slow down if we want to close the digital divide once and for all and achieve the next generation of wireline and wireless connectivity.

The SHLB Coalition has mailed hard copies of this Action Plan to each of the FCC Commissioners and several staff, so we are filing this in the relevant proceedings.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

John Windhausen, Jr.
Executive Director

Policy Recommendations

The SHLB Coalition encourages the FCC to:

Competition

- Establish price controls on Business Data Services where there is market power
- Increase both licensed and unlicensed spectrum capacity to enable 5G capability

E-rate

- Follow through on the commitment in the E-rate decisions to establish national pricing benchmarks for broadband services to ensure that schools and libraries in high-cost areas are able to purchase services at rates reasonably comparable to urban areas
- Expand enforcement of the “lowest corresponding price” rule in the E-rate program to make sure broadband providers are not inflating prices because of the E-rate discount
- Allow schools and libraries to extend their networks to serve the surrounding community. For instance, the FCC could allow schools to partner with low-income housing projects and allow E-rate supported networks the use of TV white space technology to extend services to the homes of students
- Continue incentivizing consortium bidding
- Increase the rural discount factor for E-rate program to provide greater funding for rural schools and libraries, especially in “remote” rural areas and tribal lands

Health

- Reform and modernize the Rural Health Care Program
 - Increase the 65 percent cap on funding from the Healthcare Connect Fund to 85 percent.
 - Encourage shared capacity between health care providers, other community institutions, consortia, and public-private initiatives.
 - Support consortia that include non-rural health facilities, so as to promote the use of urban-rural telemedicine solutions such as remote patient monitoring and specialist consultation.

Mapping

- Maintain the National Broadband Map
- Ensure that the Map includes Community Anchor Institutions.

Digital Inclusion

- Craft a comprehensive plan by October 2016 to address the non-price barriers to digital inclusion and engage CAIs in the development of this plan
- Increase the amount of the Lifeline subsidy for low-income families
- Increase its commitment to tribal territories
 - Develop performance goals and measures for improving broadband availability to tribal schools and libraries
 - Create a Tribal Broadband Fund to promote deployment and adoption